

# PUBLIC COMMENTS

## PUBLIC PARTICIPATION WRITTEN COMMENTS RECEIVED ON 2020/2021 REVISED INTEGRATED DEVELOPMENT PLAN (IDP) AND 2020/2023 MEDIUM TERM REVENUE AND EXPENDITURE FRAMEWORK

### FOR CONSIDERATION BY THE TOP MANAGEMENT TEAM, BUDGET STEERING COMMITTEE AND COUNCIL

No.	Local Community / Other Stakeholders Comments	Ward / Area	Senior Management Comments
1.	<p><b>Draft Rates Policy:</b></p> <ul style="list-style-type: none"> <li>▪ To avoid confusion, it is suggested that reference to the Municipal Property Rates Act, (Act No. 6 of 2004) should be consistent. In this policy both “MPRA” and “The Act” is used.</li> <li>▪ Clause 3 – Check spelling of regulatory in the heading</li> <li>▪ Clause 7: Definitions – It is suggested that where the definitions refer to sections of the MPRA, the words “of the MPRA” should be inserted.</li> <li>▪ Business and Commercial – Rating farm properties that are used for eco-tourism or hunting of game at the business tariff will render most of these operations uneconomical and will have a negative effect on the local economy and job creation. Flats, old age homes and selfcatering/holiday flats should be categorised as residential property in compliance with the MPRA definition of “residential property”.</li> <li>▪ Pensioner – Drafting of part (c) could be improved: <i>“a person under the age of 60 years who has been boarded for medical reasons and is not able to do any type of work”</i>.</li> <li>▪ Public Benefit Organisations – The definition is the same as the definition of ‘public benefit organisation property’ in the ratio regulation and</li> </ul>	ALL	<ul style="list-style-type: none"> <li>• The word “Act” has been removed and replaced by “MPRA”.</li> <li>• The spelling of REGULATORY has been corrected.</li> <li>• It is written as such o the Rates Policy.</li> <li>• The eco-tourism or hunting of game is excluded in the definition of agricultural property in terms of the definition on the MPRA.</li> <li>• It has been corrected on the Rates Policy as recommended. The words “who may be below” has been replaced by the word “under”</li> <li>• It has been corrected on the Rates Policy as recommended.</li> </ul>

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	<p>definition in the policy must be changed to <i>“Public Benefit Organisation Property”</i>.</p> <ul style="list-style-type: none"> <li>▪ Residential property – The definition could be ultra vires as it is in conflict with the MPRA definition. The definition should reflect the amendments to the definition in the MPRA. The MPRA definition refers to “residential purposes”. It is suggested that a definition for “residential purposes” be included in the policy and the MPRA definition included verbatim in this policy.</li> <li>▪ Clause 8: Imposing of rates – Sub clauses are not numbered correctly, there is no 8.1 or 8.3</li> <li>▪ Clause 8.2 – If properties used for game farming and eco-tourism are rated as “Business/Commercial Properties” it will kill these industries. Have you considered the rates that will be payable to these properties? Based on the draft tariffs, rates will be R31 517,00 per annum per R1 000 000 of value. If the same property is rated as “Agricultural Properties” rates will be R3 152,00. The annual rates could be more that the value of farmland that is used for game farming and eco-tourism.</li> <li>▪ Clause 8.4 – It is not necessary to refer to rating in the heading of the category. Reference to section 9)2)(b) is not correct, section 9(1)(b) is applicable. Proposed rewording: <i>“8.3 PROPERTIES USED FOR MULTIPLE PURPOSES In terms of section 9(1)(b) of the Act, properties used for multiple purposed will be categorised based on the dominant use;”</i></li> <li>▪ Clause 9: Rates relief measures relating to categories of property and categories of owners of property.</li> </ul>		<ul style="list-style-type: none"> <li>• It will be considered in the next Policy review and to be implemented with the new General Valuation.</li> <li>• It has been corrected on Rates Policy.</li> <li>• The eco-tourism or hunting of game is excluded in the definition of agricultural property in terms of the definition on the MPRA.</li> <li>• It has been corrected on Rates Policy as recommended. Section 9(2)(b) of the MPRA has been replaced with Section 9(1)(b) of the MPRA</li> </ul>

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	<ul style="list-style-type: none"> <li>○ Clause 9.1 B Religious Organisations – These properties are excluded from rates and not exempted as suggested in the policy. The clause should be removed from the policy or it should be moved to a new clause under the heading “Exclusions”.</li> <li>○ Clause 9.2 A Pensioners and Disabled Persons: Clause 9.2 A(iv) – it does not make sense to include the alternative effective date (on which the application is received). The date on which the applicant turned 60 will always be the oldest date and should be the only applicable date.</li> <li>○ Clause 9.2.2 – Is it realistic to set a deadline for 30 June, a realistic deadline of 31 August is suggested? It also means that the applications must be submitted before the rates policy is approved. Exemptions should be backdated to the beginning of the financial year or to the date of qualification.</li> <li>○ Clause 9.2.3 Newly Developed Commercial or Industrial Properties – The second bullet could be reworded: <i>“The market value of the developed property must be at least R50 000 000. This requirement does not apply to properties in the East London Industrial Development Zone.”</i></li> </ul>		<ul style="list-style-type: none"> <li>• It has been corrected on the Rates Policy and the heading “Exclusion “added, and religious organisations are reflected as exclusions not exemptions.</li> <li>• The rebate is on application bases and is processed from the date the application has been received in order to cater for all qualifying applicants.</li> <li>• The Rates Policy is approved before 30 June. Even though the deadline is 30 June, the late applications are still acceptable to 1 September before applications are processed.</li> <li>• Yes, the exemptions are backdated with effect from the beginning of a financial year, but rebates from the date of application as rebates are processed from the budget of that financial year. And the reason for that is to make sure that a number of applicants are able to receive a rebate not a few.</li> <li>• Yes, that is correct, all the properties in the East London Industrial Development Zone whether are privately owned or in the name of IDZ, they do qualify for a rebate for the properties below R 50 000 000.</li> </ul> <p>Proposed: The market value of the development must be at least R50 000 000. A separate consideration can be made and approved by Council</p> <p>The comment received from Rates Watch relating to this matter does not require change in the current implementation of this section. The</p>

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	<p>The rebate should be granted from the effective date of the supplementary valuation. The last part of the 3<sup>rd</sup> bullet should be reworded: <i>“The rebate will be granted from the effective date of the supplementary valuation.”</i></p> <ul style="list-style-type: none"> <li>○ Clause 9.2.4 B – The principle to grant rebates that is linked to the availability of services should be reconsidered. Property rates is a tax and there should be no link to it and the provision of services.</li> <li>▪ Clause 10: Procedures – The procedures are in relation to the relief measures and it should be a sub-clause of clause 9.</li> </ul>		<p>comment only sought to re-word the section as recommended and the rewording has been done.</p> <p>The value of R50M does not apply to properties within the ELIDZ in order to attract specifically targeted economic activities into the zone. This is also what was agreed upon by the finance committee consisting of ELIDZ and BCMM reps when rebates for the ELIDZ were proposed.</p> <ul style="list-style-type: none"> <li>•Supported but will be considered in the next Policy review to be implemented with the new General Valuation. Extensive consultation is required with the affected property owners, mostly farms.</li> <li>• It is not necessary as it does not give any impact.</li> </ul>
2.	<b>Tariffs</b> should not be increased at all.	ALL	<p>The proposed increase is informed by input costs that are incurred by the municipality to render its services. The tariff increases are necessary to ensure that the municipality can address essential operational requirements, maintenance of existing infrastructure, new infrastructure provision and to ensure the sustainability of the services. The COVID-19 pandemic has put further strain to the municipality as it must now incur new cost factors to mitigate the risk of this pandemic that was never preceded before.</p>
3.	<p>a) Be advised that of significance in the IDP Budget, indication is given for increase in all service charges, most notably Electricity, Water and Rates. Chamber submits that these increases are ill advised and certainly come as a hammer blow to all Business and residents alike. Furthermore, of the proposed increases, most are more than the rate of inflation, BY FAR.</p>	All	<p>Electricity tariff increases are in line with the guidelines that are approved by the National Electricity Regulator of South Africa (NERSA).</p> <p>The input cost factors are informing the proposed tariff increase for water, for example, Amatola Water which provide BCMM with some of the bulk water is increasing its bulk water tariffs by 8.28% and this rate has been approved by the National Department of Water and Sanitation.</p> <p>The tariff increases on services and rates address essential operational requirements, maintenance of existing infrastructure, new infrastructure provision and to ensure the sustainability of the services.</p>

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4.	<p>Local businesses have been completely decimated by the COVID-19 pandemic. BKCOB members surveyed have lost over 150 million rand in revenue and several have closed their doors (GMR survey, 2020; BKCOB survey, 2020). As at February 2020 the annual Consumer Price Index (CPI) was 4,6% (StatsSA, 2020). By increasing the various utility costs by 6.22% - 9.2% it directly affects both citizens and businesses' disposable income. In addition, the poor collection rate of 80.18% as at 30 April 2020 will likely not improve. The provision for bad debts increasing to 9.5% is completely unacceptable. By improving revenue collection, utility cost increases would be nominal.</p>	All	
5.	<p>I would like to object against the following proposed increases</p> <ul style="list-style-type: none"> <li>▪ Water - 9.2%</li> <li>▪ Sewage- 9.2%</li> <li>▪ Rates - 8.5%</li> </ul> <p>These are over the CPI rate and should be reduced to be in line with CPI. To have these over inflated increases again for the 4th year in row is not fair on residents and businesses in BCM, you are discouraging any investment etc.</p> <p>Plus, in these times where many residents and businesses have been on reduced salaries or no salary, businesses closed etc.</p>	All	<p>The input cost factors are informing the proposed tariff increase for water, for example, Amatola Water which provide BCMM with some of the bulk water is increasing its bulk water tariffs by 8.28% and this rate has been approved by the National Department of Water and Sanitation.</p> <p>The tariff increases on services and rates address essential operational requirements, maintenance of existing infrastructure, new infrastructure provision and to ensure the sustainability of the services.</p>
6.		Ward 50	

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	<p>a) As things stand the 1-2 water tankers that supply Kwelera with water (reservoirs and village tanks) are way too few and barely manage to achieve 50% of efficiency, especially now that the demand for water has drastically increased by effects of the current world pandemic of COVID-19. More needs to be done to increase the number of tankers supplying rural villages, preferably by sourcing BCMM own fleet and staff instead of tenders including their management thereof.</p>	Kwelera	<p>The City has budgeted for more fleet to deal with its challenges. More tankers will be hired to ensure adequate capacity where deemed necessary. The situation in Ward 50 is receiving a lot of attention and working with the ward councillor has been very successful to limit challenges.</p>
7.	<p>a) Community members of Sweetwaters complain that they've been holding Blue cards for the RDP houses to be built at Breidbach long time ago, and been asked to go to Municipal offices in King William's town for capturing, door to door been made to those holding Blue cards, BCM is quiet about that.</p>	Ward 44	<p>After BCMM funded the Provincial Department of Human Settlement through the Urban Infrastructure Development Grant, the project of Breidbach is under construction by the Provincial Department of Human Settlements.</p> <p>Service Providers have been appointed to do a Feasibility Study on the land adjacent to Sweetwater's, being Erf 9582 KWT in order to determine if it is feasible for township development. The Inception Report and the draft development perspective has been completed.</p>
8.	<p>Having mentioned the growing numbers of confirmed cases here in West Bank, is it possible if we can get a voluntarily Testing Centre here in West Bank Town?</p>	Ward 19	<p>PROVINCIAL DEPARTMENT OF HEALTH:</p> <p>The number of confirmed cases in Westbank is due to the confirmed cases in East London Correctional Center. These cases do not pose any risk to the residents of Westbank and Greenfields as they are in an enclosed setting and measures are being taken to contain the transmission of the virus.</p>

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			<p>All communities are supposed to observe the COVID 19 containment measures which are key.....stay at home and only leave the house to do essential business, wear a mask, observe social distancing and sanitize their hands and surfaces at home....stay away from social gatherings especially funerals.</p> <p>The Department of Health now implements a targeted approach in testing. Confirmed cases are traced and isolation procedures implemented, and contacts are traced, screened and those that qualify for testing tested and quarantine procedures implemented.</p> <p>The Department of Health does not provide Voluntary Testing Centers and does not test individuals that require voluntary testing outside the criteria that have been tabled in the current targeted testing guidelines.</p>
9.	I support the call for Buyelembo Village NPO based at Masingata Location to be supported and recognized by BCM as an Artist Hub/Incubator	Masingata Location, KWT	The municipality has for the past two years supported the Buyelembo Arts Festival which aim is to provide training and capacity building as well as showcase the local artists. This shows that the municipality has recognized the work that is done by the NPO hence the support that has been provided previously. The Directorate of Economic Development has previously supported programmes that provides training and capacity building as well as access to the market. In the 2020/2021 financial year the Directorate does not have budget allocated for artists support programmes.
10.	Procure own trucks (as a charter service) for garden refuse and tree felling and encourage the residents to visit the BCMM offices to hire those services at reasonable rates (example @ R120 load) as and when needed. That will create employment while discouraging our residents from opening illegal dumping sites in the urban areas as most illegal dumping sites are made of 80% garden refuse. As you are aware that the which the BCMM solid waste removal truck do not collect the garden refuse, which compels people to opt to open illegal dumping sites.	ALL	BCMM is not mandated to run a business but to render services to communities. Community entrepreneurs have a right to open Garden Services companies and render a business service and that is encouraged. In responding to illegal dumping and shortage of waste facilities (especially garden transfer stations) BCMM is in a process of converting some of the old and closed dumping sites into garden transfer stations so that all people of BCMM has access to garden transfer station within reasonable distance throughout the Metro especially in Midlands and Inland Regions where there is none at the moment.

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11.	High mast lights and street pole lights need to be serviced as some streets at this ward are dark and potential breeding grounds for crime	Ward 11	Streetlights and high mast lights maintenance form part of daily operations in BCMM. The municipal website has an application which enables residents to report lighting problems in the city with precise locations and pictures where possible.
12.	Winnie Mandela and Ramaphosa informal settlements (and others) are the oldest informal settlements in this ward since 1990 and to date they have no houses built for their residents, besides promises in IDPs. They need to be prioritized before the voters in those areas lose confidence in the political party that is governing BCMM.	Ward 11	Winnie Mandela has been identified in terms of the Mdantsane Infill Areas Project. Currently it has not been planned and surveyed.  Ramaphosa Informal Settlement is currently not planned and surveyed but has been included in the National Upgrading support Programme (NUSP) through National Department of Human Settlements for In-situ/Incremental Upgrading.
13.	<ul style="list-style-type: none"> <li>▪ Potholes - Tainton Road. Bonnie Doon</li> <li>▪ At intersection Tainton and Irvine Road many potholes road breaking up</li> <li>▪ In front of house no 3,4,5,6,7,8,10,12,14,16, - whole area around the circle breaking up numerous potholes all over and around the circle at end of the road.</li> <li>▪ The entire road needs to be overlaid.</li> </ul>	WARD 18 – BONNIE DOON TAINTON ROAD	Roads in the area have been attended for each budget year according to the budget available and priority roads agreed with the ward. Further work will be done in 2020/20 financial year. The ward will be consulted on which priorities must be attended under the tight budget circumstances.
14.	a) We request renovation of our small dilapidated hall that we have in the community. A construction of a hall for Mount Coke has always been on the IDP document since 2017/18 financial year and only in 2019 we were told that BCMM does not construct community halls.	Ward 40 Mount Coke	Statement that “a construction of a hall for Mount Coke has always been on the IDP since 2017/18” is incorrect. Due to budget constraints BCMM do not have budget to construct Community Halls for all areas and villages. In the past three years, BCMM constructed only Nompumelelo Hall. Ward 40 has Halls close to Mount Coke such as Dubu, Mimosa, Tshabo, Masele, Qaga, and Shushu. In the MTREF (2020/21 – 2022/23) BCMM has no budget for Mount Coke Hall.
	b) Mount Coke Youth request an upgrade of a sports field so that they are able to continue with sports activities like Netball, Soccer and Rugby. Youth always hold Annual Sports' Tournaments for surrounding areas.	Ward 40 Mount Coke	The Earthworks were undertaken in 2016/17 as part of upgrading of Mount Coke Sport Field. The challenge was and remain the land ownership (land belongs to the Department of Public Works) and BCMM is engaged in the process of land transfer to BCMM. BCMM continues with the maintenance of the playing ground and soon the goal posts will



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			be delivered but no major upgrading until land ownership issue is resolved.
15.	The municipality must take into consideration how they can assist event organizers because most of us only rely on events and we have families to feed and there are young people that we hire and make change to their lives.	ALL	<p>The municipality has identified events as one of the strategies it can use to grow its economy. This is due to the fact that events provide the following benefits:</p> <ul style="list-style-type: none"> <li>• Ability to increase visitor numbers to the destination</li> <li>• Ability to increase geographic spread</li> <li>• Contribute towards breaking seasonality</li> <li>• Create job opportunities for the local community</li> </ul> <p>In the last 5 years the municipality has been supporting event organisers through providing financial sponsorship towards events that are hosted in the city which are in line with the municipality's events strategy. In the 2020/2021 financial the municipality does not have budget allocated for sponsored events.</p>
16.	a) Cleaning of spaces (the road down to Noncedo store).	Ward 21 N. U 13	There are weekly and on-going clearing of illegal dumps throughout the Metro and that include Ward 21
	b) If the BCMM refuse/waste dept can liaise with roads section, just for a grader to clean up the areas and put up "no dumping signs.	Ward 21 N. U 13	"No Dumping Signs" are placed in all illegal dumping hot spots and BCMM further communities to be part of "Adopt a Spot" programme were communities identify a dumping spot that is problematic, and they can convert it into an alternative use (recreational park or a community food garden patch).
	c) Meter reading and correct billing.	Ward 21 N. U 13	The municipality bills its consumers based on the actual consumption on receipt of the actual meter reading. In the event that a reading cannot be obtained, an interim is raised on the consumer/s account/s and such is reversed once an actual reading is obtained. The City is in a process of improving effectiveness in the meter reading function with the intention

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			of reducing the use of interim as much as possible. The rollout of the smart metering will also assist in addressing the above.
17.	The government, province, district, municipality, own Haven Property Developers, agents fooled me as far back as 2012 when I bought my Gonubie Palms Estate town house. They promised to join efforts in putting up a tar road from the Gonubie Main up to at least the development. Up to now it is stories. The gravel is not properly maintained.	Gonubie Palms	Provincial Roads is being engaged on the request for continued maintenance of the Quenera access road, and they have responded at specific intervals which seems not to meet the complainants satisfaction. The matter will be addressed with the department further.
18.	Can you tell us how far the Ebuhlanti braai place in terms of renovation is?	Ward 19	<p>Contractor is already on site  General Environmental Upgrade of Ebuhlanti to take place over the next two months. Delays due to Covid-19 Lockdown Regulations.  Phase 1 will include:</p> <ul style="list-style-type: none"> <li>- Fixing of ablutions</li> <li>- Cleaning</li> <li>- Installation of new bins</li> <li>- Clearing of bushes</li> </ul> <p>Phase 2</p> <ul style="list-style-type: none"> <li>- Amphi-theatre constructed</li> <li>- Braai Stands constructed</li> </ul> <p><i>This response was communicated with the member of the public on 19 June 2020.</i></p>
19.	When are you going to build houses for the people of Muvhango in ward 10? That is why we have these illegal connections in our areas. I want to know is it fair to the people in the houses that are without lights now and we are chronic people?	Ward 10 Muvhango	<p>The area called Muvhango is also called on BCMM records as N2 Road Reserve/Haven Hills South and has been planned and approved by Council for Township Establishment in October 2014.</p> <p>The N2 Road Reserve/Haven Hills South was a vacant piece of land and as soon as Council approved the layout plan in October 2014 people it got invaded.</p>

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20.	<p>“The budget indicates amounts of R40m for the 2020/2021 financial year and R26m for the 2021/2022 financial year for the “Boxwood” development</p> <p>We again, as indicated in a previous letter to the Municipal Manager that we object to the relocation of the Orange Grove Informal Settlement to Farm Boxwood ( as per a council decision)as it is outside of the Urban Edge contained in the Spatial Development Framework ( which makes out an important section of this IDP) of the City and as it represents an apartheid style settlement far away from the City which will put the Orange Grove community in a poverty trap.”</p>		<p>Whilst an argument sounds correct in terms of the petition; it is the view of the office that it is rather very harsh label to a democratically established Buffalo City Metropolitan Municipality.</p> <p>Unequivocally, apartheid system was described as a “crime against humanity” by United Nations and it is not possible for a democratically elected government to continue pursuing tactics of such a denounced regime as undemocratic and unjust. With due respect to the Petitioner/s a view that seeks to say Boxwood Township Development is a resemblance of apartheid settlement patterns needs to be totally rejected, because of the following reasons:</p> <ul style="list-style-type: none"> <li>i) The project was democratically initiated by the people of Orange Groove after an encroachment complaint from Airports South Africa (ACSA).</li> <li>ii) ii) Leaders of Orange Grove Community decided to approach provincial and local government about the matter in an attempt to have descent houses.</li> <li>iii) Subsequently a “steering committee” was established which was inclusive of Orange Grove community leaders, Buffalo City Metropolitan Municipality and Eastern Cape Department of Human Settlements (EC: DOHS).</li> <li>iv) After several engagements it became clear that Buffalo City Metropolitan Municipality has no available piece of land that can accommodate a new settlement within Central Business District (CBD).</li> <li>v) Eastern Cape Department of Human Settlements offered to secure a piece of land for the aspired township development and that was done with Orange Grove Community leaders.</li> <li>vi) It is that process which culminated into a realisation of Orange Groove people’s aspiration to secure the land at Boxwood Farm.</li> <li>vii) ECDHS then requested BCMM to ensure that land is properly assessed through Environmental Impact Assessment (EIA) regime process.</li> </ul>

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			<p>viii) Hence after the scientific analysis, BCMM Spatial Planning &amp; Development and Human Settlements respectively commenced with all due processes of establishing a new Boxwood Settlement.</p> <p>ix) Investment made into the project thus far seeks to represent a “People Centred Development” approach which is central into the concept of a developmental local government.</p> <p>In conclusion, the claim made against BCMM does not hold water. Certainly, it is not possible to reverse the project as it is a people’s project and. If a different view arises after so many years of great strides by a democratic government such a view/s can only be accommodated within a context of integrated Human Settlements.</p>
21.	It is time that Buffalo City Metro prioritizes the Beacon Bay Gonubie link road. Phase 3 should be in progress without any further delays.	Quenera, East London	It is important to note that Council has committed itself to complete this project wherein Phase 1 and 2 have been completed by end of 2019/20 financial year. Further phases which is phase 4, 5, 6,7 and 8 are currently at final stage of funding mobilization which will determine the speed at which the project proceeds.

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22.	<p>TOPIC: THE NAHOON RIVER ESTUARY</p> <p>Current State and Action Plan</p> <ul style="list-style-type: none"> <li>▪ No action appears in this section regarding the implementation of the Nahoon and Buffalo River Estuary Management Plans</li> <li>▪ It is recommended to include it under a new heading: Estuaries</li> </ul> <p>Current State: Nahoon Estuary Management Plan promulgated by MEC for DEDEA and adopted by Council. Buffalo River Estuary Management Plan approved by Minister of Environmental Affairs and adopted by Council.</p> <p>Action Plan: Implement the Nahoon River and Buffalo River Estuary Management Plans.</p>		<p>Nahoon Estuary Management Plan was gazetted by MEC for DEDEA for implementation and adopted by Council. Buffalo River Estuary Management Plan approved by Minister of Environmental Affairs and waiting for its adoption by Council. To ensure that there is coordinated actions and responsibilities of all different organs of state both plans will form part of the standing items on the Municipal Coastal Committee.</p> <p><u>ACTION:</u> Implementation of Nahoon Estuary and Buffalo River estuary Management Plans this includes having a Communication, Education and Awareness Raising to create a supportive environment for the implementation of both Estuarine Management Plans.</p>
23.	<p>KFA 18: SOLID WASTE</p> <p>In the introduction: "It is also guided by its strategic Integrated Waste Management Plan which is presently under review"</p> <p>This is incorrect:</p> <ul style="list-style-type: none"> <li>▪ The existing and valid Integrated Waste Management Plan is dated 2005</li> <li>▪ The Waste Management Act requires that the IWMP be reviewed every 5 years</li> <li>▪ A "review" was done in 2014 but remained a draft as no public participation was completed for the draft</li> </ul>		<p>BCMM undertook the review of the IWMP through an internal process and that internal process was completed in late last year (2019), BCMM have 2019 Draft IWMP and not of 2014. The IWMP Public Consultation and Stakeholder Engagement Plan was approved by the Mayoral Committee but was unfortunately affected by the National Declaration of the State of Disaster in late March. The Public Participation and Stakeholders Engagement will be undertaken through print media, digital media and through virtual meetings and once that process is completed it will be taken to Council for consideration and final approval. Once approved by Council, IWMP will be submitted to the National and Provincial Environmental Authorities (DEFF and DEDEAT) for gazetting. The IWMP like any plan is not a budget and all the IWMP projects and catalytic projects will find expression in the BCMM MTREF Budget.</p>

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	<ul style="list-style-type: none"> <li>▪ The 2014 review was not based on any information as the municipality has no waste information system as is required by law (Waste Management Act)</li> <li>▪ The information and recommendations contained in the 2014 review is now outdated and irrelevant as it was done 6 years ago</li> </ul> <p>Therefore, it is required that the BCMM start afresh to review their Integrated Waste Management Plan, this time with good research as a foundation for the Plan and to complete it with public participation right from the start. Funds for such Plan must reflect in the Budget.</p>		
24.	<p><b>HUMAN SETTLEMENTS</b></p> <p>The budget indicates amounts of R40m for the 2020/2021 financial year and R26m for the 2021/2022 financial year for the “Boxwood” development</p> <p>We again, as indicated in a previous letter to the Municipal Manager that we object to the relocation of the Orange Grove Informal Settlement to Farm Boxwood ( as per a council decision)as it is outside of the Urban Edge contained in the Spatial Development Framework ( which makes out an important section of this IDP) of the City and as it represents an apartheid style settlement far away from the City which will put the Orange Grove community in a poverty trap.</p>		<p>The Buffalo City Metropolitan Municipality (BCMM) resolved to approve the Township Establishment and to amend the Buffalo City Metropolitan Municipality Spatial Development Framework because the proposed application for the Township Establishment did not comply with the BCMM SDF in terms of the Urban Edge.</p>
25.	<p>In the section” Mechanisms in brief” Petitions are missing</p>	All	<p>As a matter of fact, the claim made by the Petitioner cannot be contested. However, Office of the Speaker has since started a process of building capacity of all Section 79 Council Committees:</p> <ul style="list-style-type: none"> <li>a) Recruitment of Petitions Coordinator was done in December 2019 in consistent with Petitions Management Committee requirements,</li> </ul>

No.	Local Community / Other Stakeholders Comments	Ward / Area	Senior Management Comments
	<p>Petitions is a very important way for the community to participate with the Council. It is a basic human right in terms of the Constitution.</p> <p>It needs to be included in the Mechanisms in brief. Yet the municipality are not considering Petitions. In the Council agenda for a meeting held on 27 September 2019, the municipality confirmed that it is not considering Petitions because it lacks a chairperson, it lacks staff and funding</p> <p>We require that you include staff and funding for the Petitions Committee in this IDP and Budget to ensure</p>		<p>b) BCMM Council resolved to reconfigure Petitions Management Committee and a new Chairperson was appointed by the Council.</p> <p>c) A great work has been done in terms of consideration of petitions by a PMC, however that matter that relates to Boxwood has not been entertain yet. Next committee meeting will definitely attend to the matter.</p> <p>In full confidence, Office of the Speaker can vow to support establishment process of the PMC by ensuring that necessary support is provided in terms of human, material, and financial resources.</p>
26.	<p>b) We note with grave concern that notice to attend roadshows for the IDP &amp; Budget were sent to residents, as late as Friday 13<sup>th</sup> June, advising of IDP roadshows commencing the 14 and 15<sup>th</sup> June 2020. Also, to note, no official notice was sent to the Border-Kei Chamber of Business, advising of said intention. We wish to record our protest and that more notice must be and needs to be given. Our proposal is a minimum of two weeks – of the date of Friday 13<sup>th</sup> June.</p>	All	<p>The protest on the limited time availed for the public to comment on the draft IDP and Budget is noted. Due to the National State of Disaster, the approval of the draft IDP and Budget by Council was delayed. As a result, the period allowed for the public to comment was reduced in order for Council to adopt the IDP and Budget before 30 June 2020 as is legally required. The proposal can, therefor, not be recommended.</p>
27.			